

## COUNT TWO: EQUAL PROTECTION

200. PLAINTIFF ALLEGES AND INCORPORATES BY REFERENCE PARAGRAPHS 1-THROUGH 149  
 201. PLAINTIFF IS A MEMBER OF A PROTECTED CLASS; A PERSON WHO BENEFITS FROM PROTECTION  
 BY STATUTE SUCH AS TITLE VII, OR THE CIVIL RIGHTS ACT OF 1964, WHICH PROHIBITS DISCRIM-  
 INATION BASED IN RACE, NATIONAL ORIGIN OR RELIGION

202. PLAINTIFF ALLEGES TO BE A MEMBER OF A RACE PROTECTED CLASS BASED PLAINTIFF RACE,  
 PLAINTIFF AGE, AND RELIGIOUS BELIEFS. PLAINTIFF, A 76 YEAR OLD DARK SKIN BL-  
 ACK MALE, FOUNDER-AN-LEADER OF THE 'CHILDREN OF THE SUN CHURCH'; PLAINTIFF  
 THE ACKNOWLEDGE FOUNDER-AN-LEADER OF THE CHILDREN OF THE SUN CHURCH, BASKETBALL  
 OFFICIAL SINCE 1965; SOFTBALL UMPIRE SINCE 1956; FOOTBALL AND VOLLEYBALL OFFICIALS  
 UNQUESTIONABLY QUALIFIED; PLAINTIFF ALLEGES TO SUFFERED FROM SAME FORMS OF AN-  
 VERSIVE EMPLOYMENT ACTION, ACCESS TO RELIGIOUS PRACTICE, MEDICAL CARE, AND RETALIATION  
 203. PER RETALIATION DEFENDANT CONDUCT OCCURRED WHETHER OTHER INMATES IN SIMILAR  
 SITUATED WERE PROVIDED SERVICES-AN-OPPORTUNITIES, WHO MIGHT NOT A PROTECTED CLASS;  
 YOUNGER, AND LESS QUALIFIED. PLAINTIFF WAS SINGLED OUT, RETALIATORY ACTIONS  
 WERE INTENTIONAL, IMPATIENT, AND DANE PREGULARLY

204. ON OR NEAR 11.27.18; 12.13.18; 2.8.19; 4.2.19; 5.30.19; 6.17.19; 8.1.19; 9.5.19; 10.3.19; 11.1.19;  
 1.28.20; 2.3.20; 2.17.20; 3.16.20; 3.25.20; 5.4.20; SICK CALL, DEFENDANT, K. DELISMA,  
 MEDICAL DIRECTOR, DISCRIMINATED AGAINST PLAINTIFF, INTENTIONALLY AND FOR NO  
 RATIONAL REASON; NON MEDICAL REASON; i.e. RETALIATION TO PENALIZE PLAINTIFF FOR  
 COMMUNICATIONS WITH AUTHORITIES. DEFENDANT, DELISMA ACTION VIOLATED PLAINTIFF  
 RIGHTS-AN-CONSTITUTE EQUAL PROTECTION SEE: 14TH AMENDMENT

205. SAME EVENTS: DEFENDANT, DELISMA WHILE C. "HINCTING THE SAME SICK CALL  
 PROVIDED MEDICAL CARE FOR ALL OTHER INMATES, ESPECIALLY WHITE INMATES, INC-  
 FULLY, BASED ON NON MEDICAL REASONS, i.e. HATE, RETALIATION, PENALTY FOR COMMUNI-  
 CATIONS WITH AUTHORITIES. DEFENDANT, DELISMA DENIAL OF MEDICAL CARE VIOLATED PL-  
 AINTIFF RIGHT OF EQUAL PROTECTION GUARANTEED PER 14TH AMENDMENT

206. ON OR NEAR 10.16.17 THROUGH FEBRUARY 2019; DEFENDANT, W.L. BOWERS, A-BLACK  
 UNIT MANAGER, HOUSING, FOR NO RATIONAL REASON, TARGETED, INTENTIONALLY DIS-  
 CRIMINATED AGAINST PLAINTIFF, AND RETALIATED AGAINST PLAINTIFF BASED ON RACE.

207. SAME EVENTS: HOUSING. DEFENDANT, BOWERS ASSIGNED ALL OTHER INMATES, ES-  
 PECIALLY WHITE INMATES TO THE CELL OF THEIR CHOICE UPON REQUEST, EVEN WITH  
 FORBIDDEN/KNOWLEDGE OF THE RISK TO PLAINTIFF HEALTH, BASED ON NON MEDICAL INTEREST,  
 i.e. RACE, RETALIATION, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES, DEF

208. SAME EVENT: DEFENDANT, BOWERS ACTIONS VIOLATED PLAINTIFF RIGHTS-AN-CONSTITUTE  
 EQUAL PROTECTION VIOLATION PER FOURTEENTH AMENDMENT SEE: 302-304, 380-383, 392, 397, 398

209. ON OR NEAR 10.16.17 THROUGH 12.10.19, RELIGIOUS PRACTICE, DEFENDANT, W.L. BOW-  
 ERS FOR NO RATIONAL REASONS, RETALIATED / INTENTIONALLY DISCRIMINATED AGAINST  
 PLAINTIFF BASED ON RACE-AN-RELIGION SEE: 105-113, 389, 397, 398, 421, 496, 398

210. SAME EVENTS: DEFENDANT, BOWERS ON A DAILY BASIS SUED, DENIED RECOGNIZ-  
 ED PRIOR COURT APPROVED COURT ORDERS / AND OR SCI-SOMERS ET APPROVED EXCEPT-  
 AC: 3:19-cv-00196

ION FOR EXTRA PROPERTY INSIDE INMATE CELL, ESPECIALLY WITHIN INMATES THOSE, RELIGIOUS PROPERTY, BASED ON NON PENALDOICAL REASONS, I.E. RELIGIOUS BELIEFS, RACE, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES. DEFENDANT, BOWERS DENIAL OR RELIGIOUS LITERATURE BY USE OF THE MOST RESTRICTIVE MEANS. DEFENDANT, BOWERS ACTIONS CONSTITUTE EQUAL PROTECTION VIOLATION PER 14TH AMENDMENT, 18 USC 3211. ON OR NEAR 8.3.17 ONGOING TO DATE! RELIGIOUS PRACTICE, DEFENDANT, P. MAUST, CHAPLAIN SUPERVISOR, FOR NO RATIONAL REASONS RETALIATED /INTENTIONALLY DISCRIMINATED AGAINST PLAINTIFF. SBE: 252, 261-264, 268, 287-290, 390, 392, 396-398, 320, 380-383, 390, 406, 407, 408,

212. SAME EVENT. DEFENDANT, MAUST ON A DAILY BASIS SUCCESSFULLY PROVIDED LITERATURE TO ALL OTHER INMATES, ESPECIALLY INMATES OF NON AFRICAN RELIGIOUS BELIEFS, WHICH FAVORED WHITES IN PARTICULAR, BASED ON RACE AND OTHER NON PENALDOICAL REASONS, I.E. RELIGIOUS BELIEFS, RETALIATION, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES. DEFENDANT, MAUST DENIED PLAINTIFF RELIGIOUS LITERATURE BY THE USE OF THE MOST RESTRICTIVE MEANS. DEFENDANT, MAUST ACTIONS CONSTITUTES EQUAL PROTECTION VIOLATIONS PER 14TH AMD.

213. ON OR NEAR 7.16.15 ONGOING UNTIL REASSIGNMENT, DENIAL OF AC-ADM 804, INMATE GRIEVANCE SYSTEM, DEFENDANT, SROKA, GRIEVANCE COORDINATOR FOR NO RATIONAL REASONS TARGETED, RETALIATED /INTENTIONALLY DISCRIMINATED AGAINST PLAINTIFF

214. SAME EVENTS: SROKA PROCESSED THE TIMELY SUBMITTED GRIEVANCES OF ALL OTHER INMATES, SUCCESSFULLY, BASED ON NON PENALDOICAL REASONS, I.E. RACE, RETALIATION, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES, DEFENDANT, SROKA DID NOT PROCESSED NUMEROUS OF PLAINTIFF TIMELY SUBMITTED GRIEVANCE. NO ALL REQUESTED MONETARY RELIEF. DEFENDANT, SROKA ACTIONS CONSTITUTE EQUAL PROTECTION VIOLATION PER 14TH AMENDMENT

215. ON OR NEAR 4.8.17, ONGOING UNTIL REASSIGNED, DEFENDANT, R. SNYDER, SECURITY CAPTAIN/MAJOR, FOR NO RATIONAL REASONS TARGETED, RETALIATED /INTENTIONALLY DISCRIMINATED AGAINST PLAINTIFF. SBE: 284-286, 320, 396, 418, 422, 380-383, 390, 392, 406, 407, 422

216. SAME EVENTS: DEFENDANT, SNYDER SUCCESSFULLY THROUHOUT THIS COURSE OF TIME ON A DAILY BASIS PROVIDED SAFETY FOR ALL OTHER INMATES, ESPECIALLY WITHIN INMATES, BASED ON NON PENALDOICAL, I.E. RACE, RELIGIOUS BELIEFS, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES. DEFENDANT, SNYDER AIDED-N-ABETTED TWO-YOUNG "WHITE INMATES" TO SUCCESSFULLY STEAL PLAINTIFF RELIGIOUS BOOKS. DEFENDANT SNYDER ACTIONS CONSTITUTE EQUAL PROTECTION VIOLATION PER 14TH AMENDMENT. SBE: 217, 73,

217. DURING THE 2019 FOOTBALL SEASON, DEFENDANT, R. PESCHACK, ACTIVITIES SPECIALIST, EMPLOYMENT, FOR NO RATIONAL REASONS INTENTIONALLY TARGETED, RETALIATED DISCRIMINATED AGAINST PLAINTIFF. SBE: 307, 308, 380-385, 400-404, 406, 407, 418, 422

218. SAME EVENTS: DURING MORE THAN CONFIDENTIAL INTERVIEW DEFENDANT, PESCHACK, ANGRY BECAUSE PLAINTIFF SUED HER, PLAINTIFF, A DARK SKIN BLACK MALE, ALWAYS HAVING SO MUCH TO SAY TO AUTHORITIES, AND PLAINTIFF ABE, DEFENDANT, PESCHACK ASSIGNED PLAINTIFF TO THIS MOST UNDESIRABLE JOB ROLE, BY PASS PLAINTIFF TO AC: 3:19-CV-30194

ASSIGN LESS SKILLED OFFICERS, OR YOUNGER OFFICERS, FOR EXTRA WORK HOURS; EVEN CONSTRUCTED A JOB REPORT WHICH PORTRAYED PLAINTIFF AS A DIMINUTED ANTIQUE, OR A "RETARD," DEFENDANT, PESCHOCK ACTION BASED ON RACE, NON PENALITICAL REASONS, i.e. AGE, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES, RETALIATIONS VIOLATED PLAINTIFF RIGHT OF EQUAL PROTECTION GUARANTEED BY 14th AMENDMENT. SEE: 307, 308, 380-383, 400-404, 406, 407, 418, 422

219. ON OR NEAR 7.11.18 ON BEING TO DATE, EMPLOYMENT, DEFENDANT, R. PESCHOCK, ACTIVITIES SPECIALIST FOR NON PENALITICAL REASONS INTENTIONALLY TARGETED, RETALIATED, DISCRIMINATED AGAINST PLAINTIFF. SEE: 392, 400-404, 211-35, 37-41, 71, 78, 401, 406, 407.

220. SAME EVENT: DURING MORE THAN ONE CONFIDENTIAL INTERVIEW, DEFENDANT, PESCHOCK DECLARED, "SHE CANNOT STAND THIS GAME OF BASKETBALL," "SHE DOESN'T WATCH THE GAMES PLAYED UNDER HER OWN SUPERVISION," "SHE'S NOT CONCERN ABOUT HOW EFFICIENT THE BASKETBALL OFFICIAL PERFORMS THEIR DUTIES ON THE FLOOR," SHE ASSIGNED PLAINTIFF TO THE LAST MORNING ROLE DUE TO PLAINTIFF AGE, AND TO PENALIZE PLAINTIFF FOR SAVING HBR. SEE: 211, 216, 307, 40-60, 62, 64, 217-219, 221-223,

221. SAME EVENTS: DEFENDANT, PESCHOCK CONSISTENTLY BY PASSED PLAINTIFF BASED ON NON PENALITICAL REASONS, i.e. AGE, CLICKS FOUNDED ON BAMES, RELIGIOUS-ETHNOGRAPHICAL RETALIATION DEFENDANT, PESCHOCK ASSIGNED PLAINTIFF TO MENTAL-ADLES, i.e. SWEEPING THE FLOOR, CHASING LOOSE BASKETBALLS, FOLDING JERSEYS WHILE ASSIGNING INMATES WITH LESS THAN HALF THE EXPERIENCE THAT PLAINTIFF HAS (LESS FOOT SIZE), OFTEN LAZY; TO VENTRAL ROLLES; i.e., OFFICIATING THE GAME. SEE: 27, 40, 59, 217-220,

222. SAME EVENTS: DEFENDANT, PESCHOCK READILY ADMITTED, THAT DURING THE LIMITED OFFICIATING PLAINTIFF WAS ASSIGNED NOT, ONCE WAS THE GAME STOPPED OR DELAYED DUE TO PLAINTIFF BEING EXHAUSTED, OR UNABLE TO KEEP UP, DEFENDANT, PESCHOCK CONSISTENTLY ASSIGNED INMATES WITH STOOD IN ONE SPOT INSTEAD OF MOVING WITH THE FLOOR OF THE GAME WHO CONSISTENTLY OR CONSTANTLY ENGAGED IN VERBAL SPARRING WITH THE PLAYERS DURING THIS GAME, INSTRUCTING PLAYERS-N-COACHES ON HOW TO SUCCESSFULLY WIN THE GAME; OFTEN CRITICIZED FELLOW OFFICIALS DURING THE COURSE OF THE GAME. SEE: 217-221, 223

223. SAME EVENTS: PLAINTIFF REPEATEDLY REQUESTED TO BE ASSIGNED TO OFFICIATE THE GAME DURING EACH CONFIDENTIAL INTERVIEW; DEFENDANT, PESCHOCK REUSED TO DO SO BASED ON NON PENALITICAL REASONS, WHICH CONTINUED TO DATE! FASTER; AND AIDED-N-ABETTED THIS STILL APPORTS OF A CLICK, MENTALLY OR UNWITTINGLY. DEFENDANT, PESCHOCK ACTIONS CONSTITUTE VIOLATIONS OF PLAINTIFF EQUAL PROTECTION PER 14th AMENDMENT. SEE: 307, 308, 380-383, 392, 400-404, 406, 407, 418, 422

224. ON OR NEAR 1.15.18, SICK CALL, DEFENDANT, J. BIRONE, MEDICAL DIRECTOR, FOR NO PENALITICAL REASONS TARGETED, RETALIATED/INTENTIONALLY DISCRIMINATED AGAINST PLAINTIFF. SEE: 292, 309, 380-383, 389, 391, 395, 406, 407, 409, 421, 423

225. SAME EVENT: DEFENDANT, BIRONE WHILE CONDUCTING THE SAME SICK CALL SUCCESSFULLY FOR ALL OTHER INMATES, ESPECIALLY WHITE INMATES, BASED ON NON MEDICAL REASONS, i.e. RACE, RETALIATION, PENALTY FOR COMMUNICATION WITH AUTHORITIES DEFENDANT, BIRONE DENIED PLAINTIFF CARE. DEFENDANT, BIRONE ACTIONS CONSTITUTED VIOLATIONS OF PLAINTIFF EQUAL PROTECTION RIGHTS PER 14th AMENDMENT.

226. ON OR NEAR 11.6.18; 11.20.18; 1.2.18; 2.4.19; 1.2.20; 1.28.20; 1.29.20; DEFENDANT, E. KAUFFMAN, SICK CALL; AAC FOR NO RATIONAL REASONS TARGETED, RETALIATED/INTENTIONALLY ALLEGEDLY DISCRIMINATED AGAINST PLAINTIFF. SEE: 120; 121; 124; 125; 141; 42; 168-170; 175-177; 391-393; 395; 409-418

227. SAME EVENTS: DEFENDANT, KAUFFMAN WHILE CONDUCTING THE SAME SICK CALL SUCCESSFULLY PROVIDED MEDICAL CARE FOR ALL OTHER INMATES, ESPECIALLY WHITE INMATES; BASED ON NON MEDICAL REASONS, I.E. RACE, RETALIATION, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES DEFENDANT, KAUFFMAN DENIED PLAINTIFF MEDICAL CARE, DEFENDANT, KAUFFMAN ACTIONS VIOLATED PLAINTIFF EQUAL PROTECTION RIGHTS PER 14TH AMENDMENT. SEE: 292; 293; 310; 380-383; 389; 406; 407; 422; 423

228. ON OR NEAR 2.19.19; EYE EXAMINATION, DEFENDANT, R. IRWIN, OPTOMETRIST TARGETED, RETALIATED/INTENTIONALLY DISCRIMINATED AGAINST PLAINTIFF FOR NO RATIONAL REASONS, I.E. RACE, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES SEE: 2135; 374; 71; 73

229. SAME EVENT: DEFENDANT, IRWIN WHILE CONDUCTING THE SAME SECTION OF EYE EXAMINATION SUCCESSFULLY PROVIDED ALL OTHER INMATES, ESPECIALLY WHITE INMATES EYE CARE, TARGETED PLAINTIFF TO DENY MEDICAL CARE/EYE CARE BASED ON NON MEDICAL REASONS, I.E. RACE, RETALIATION, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES, DEFENDANT, IRWIN ACTIONS CONSTITUTED A VIOLATION OF PLAINTIFF EQUAL PROTECTION RIGHTS PER 14TH AMENDMENT SEE: 144; 145; 391-393; 409-418; 68; 72; 294; 311; 380-383

230. ON OR NEAR 12.34.18; 12.22.19; 12.20.18; 1.28.20 SICK CALL, DEFENDANT, R. PLAYSO, AAC SUCCESSFULLY FOR NO RATIONAL REASONS TARGETED, RETALIATED/INTENTIONALLY DISCRIMINATED AGAINST PLAINTIFF SEE: 131; 132; 134; 135; 147; 177; 391-393; 409-418; 406; 407; 422; 423

231. SAME EVENT: DEFENDANT, PLAYSO WHILE CONDUCTING THE SAME SICK CALL SUCCESSFULLY PROVIDED MEDICAL CARE TO ALL OTHER INMATES, ESPECIALLY WHITE INMATES, DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS, I.E. RACE, RETALIATION, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES, DEFENDANT, PLAYSO ACTIONS CONSTITUTE A VIOLATION OF PLAINTIFF EQUAL PROTECTION RIGHTS PER 14TH AMENDMENT SEE: 31; 35; 37-41; 71; 73

232. ON OR NEAR 7.3.18, SICK CALL, DEFENDANT, L. DONNELLY, AAC FOR NO RATIONAL REASONS TARGETED, RETALIATED/INTENTIONALLY DISCRIMINATED AGAINST PLAINTIFF SEE: 21; 35; 37-41

233. SAME EVENT: DEFENDANT, DONNELLY SUCCESSFULLY PROVIDED MEDICAL CARE FOR ALL OTHER INMATES, ESPECIALLY WHITE INMATES, DENIED PLAINTIFF BASED ON NON MEDICAL REASONS, I.E. RETALIATION, RACE, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES DEFENDANT, DONNELLY ACTIONS CONSTITUTE A VIOLATION OF PLAINTIFF RIGHT OF EQUAL PROTECTION PER 14TH AMENDMENT SEE: 174; 176; 296; 313; 380-383; 395; 406; 407; 409; 410-417; 422; 423

234. ON OR NEAR 12.20.18; 12.34.18; SICK CALL, DEFENDANT, J. FETTERMAN, AAC FOR NO RATIONAL REASONS RETALIATED, TARGETED, INTENTIONALLY DISCRIMINATED AGAINST PLAINTIFF SEE: 131-134; 297; 314; 380-383; 395; 406; 407; 409-417; 422; 423

235. SAME EVENTS: DEFENDANT, FETTERMAN WHILE CONDUCTING THE SAME SICK CALL SUCCESSFULLY PROVIDED CARE TO ALL OTHER INMATES, ESPECIALLY WHITE INMATES, BASED ON NON MEDICAL REASONS, I.E. RACE, RETALIATION, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES, DENIED PLAINTIFF CARE, DEFENDANT, FETTERMAN ACTIONS CONSTITUTE A VIOLATION OF PLAINTIFF EQUAL PROTECTION PER 14TH AMENDMENT SEE: 31; 35; 37-41; 71; 73

236. ON OR NEAR 1.18.19, SICK CALL, DEFENDANT, R. HUTCHINSON, PAC FOR NO RATIONAL REASONS TARGETED, RETALIATED/INTENTIONALLY DISCRIMINATED AGAINST PLAINTIFF 237, SAME EVENT: DEFENDANT, HUTCHINSON, WHILE SUCCESSFULLY CONDUCTING THE SAME SICK CALL TO ALL OTHER INMATES, ESPECIALLY WHITE INMATES, DENIED PLAINTIFF BASED ON NON MEDICAL REASONS, i.e., RACE, RETALIATION, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES. DEFENDANT, HUTCHINSON ACTIONS CONSTITUTE VIOLATIONS OF PLAINTIFF EQUAL PROTECTION PER 14TH AMENDMENT SEE: 137, 138, 298, 315, 380-383, 391-393, 406, 407, 401-418

238. ON OR NEAR 3.22.19; 4.13.19; 6.17.19; SICK CALL, DEFENDANT, D. TESTA, PAC FOR NO RATIONAL REASONS, TARGETED, RETALIATED/INTENTIONALLY DISCRIMINATED AGAINST PLAINTIFF SEE: 146, 147, 151, 154, 299, 316, 380-383, 391-393, 395, 406, 407, 409-418, 422, 423, 21, 23-30, 33, 35, 36, 52, 63-73, 75-89

239. SAME EVENT: DEFENDANT, TESTA SUCCESSFULLY CONDUCTING THE SAME SICK CALL PROVIDED CARE TO ALL OTHER INMATES, ESPECIALLY WHITE INMATES, DENIED PLAINTIFF CARE BASED ON NON MEDICAL REASONS, i.e., RACE, RETALIATION, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES. DEFENDANT, TESTA ACTIONS CONSTITUTE VIOLATIONS OF PLAINTIFF EQUAL PROTECTION RIGHTS PER 14TH AMENDMENT SEE: 21, 33, 37-41

240. ON OR NEAR 11.7.18; 12.19.18; JANUARY 2019; CONFIDENTIAL INTERVIEWS, DEFENDANT, E. TICE, WARDEN FOR NO RATIONAL REASONS, RETALIATED/INTENTIONALLY DISCRIMINATED-N-TARGETED PLAINTIFF SEE: 116-119, 129, 130, 254, 280, 281, 368, 300, 317, 380-383, 393-395, 384, 391, 398, 418, 422, 423

241. SAME EVENT: DEFENDANT, TICE WHO SUCCESSFULLY INTERVENE-N-CORRECTED MIS-TREATMENT OF ALL OTHER INMATES, ESPECIALLY WHITE INMATES, BASED ON NON PENAL-MEDICAL REASONS. ENCOURAGED MEDICAL ~~PROFESSIONALS~~ PROFESSIONALS-N-DOCS STRIFE TO MISTREAT PLAINTIFF, AND DEFENDANT, TICE ALSO TOOK PART IN THE MIS-TREATMENT. DEFENDANT, TICE ACTIONS CONSTITUTE VIOLATIONS OF PLAINTIFF EQUAL PROTECTION PER 14TH AMEND.

242. ON OR NEAR 12.24.18; 1.17.19; 5.6, 19-5.8, 19; 12.5.19; 9.17.19; 1.24.20; 2.10.20; 3.25.21; ACCESS TO CARE, DEFENDANT, R.P. HYDE, HEALTH CARE ADMINISTRATOR FOR NO RATIONAL REASONS TARGETED, RETALIATED/INTENTIONALLY DISCRIMINATED AGAINST PLAINTIFF SEE: 134, 135, 139, 140, 152-165, 167, 178, 182, 183, 186, 195, 301, 318, 380-383, 391, 393, 394, 395, 406, 407, 422, 423

243. SAME EVENT: DEFENDANT, HYDE WHILE SUCCESSFULLY PROVIDING ALL OTHER INMATES, ESPECIALLY WHITE INMATES ACCESS TO SICK CALL, AND THOSE RECOMMENDED TO SICK CALL, ESPECIALLY WHITE INMATES, BASED ON NON MEDICAL REASONS, i.e., RACE, RETALIATION, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES DEFENDANT, HYDE DENIED PLAINTIFF CARE, DEFENDANT, HYDE ACTIONS CONSTITUTE VIOLATIONS OF PLAINTIFF EQUAL PROTECTION PER 14TH AMENDMENT SEE: 21, 23-30, 33, 35, 36, 52, 63-71, 73, 75-89

244. ON OR NEAR 12.30.19; 12.24.19; 12.3.19; 1.24.20; 2.7.20; MONKERY-N-DENIAL OF ACCESS, DEFENDANT, G. PUSKAR, NURSE SUPERVISOR FOR NO RATIONAL REASONS RETALIATED/INTENTIONALLY DISCRIMINATED-N-TARGETED PLAINTIFF SEE: 21, 36, 66, 84, 85, 89, 406, 179-181, 185

245. SAME EVENT: DEFENDANT, PUSKAR SUCCESSFULLY SECURED ACCESS TO CARE FOR ALL OTHER INMATES, ESPECIALLY WHITE INMATES, DENIED PLAINTIFF ACCESS BASED ON NON MEDICAL REASONS, i.e., RACE, RETALIATION, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES. DEFENDANT, PUSKAR ACTIONS CONSTITUTE VIOLATIONS OF PLAINTIFF EQUAL PROTECTION PER 14TH AMENDMENT SEE 389, 391

COUNT THREE: FREE SPEECH

246. PLAINTIFF ALLEGES AND INCORPORATES PARAGRAPHS 1-245

247. DEFENDANT BY THREATENING PLAINTIFF WITH VIGILANCE, OR DENIAL OF MEDICAL CARE AND EQUAL PROTECTION, AND / OR DENIAL OR RELIGIOUS PRACTICE, AND OR RLUIPA RIGHTS, RIGHTS TO PETITION THE COURT TO REDRESS GRIEVANCE, USE THIS DE-ADM 804 GRIEVANCE SYSTEM FOR INMATES SEE: 268; 38; 35; 41; 118;

248. IN A PRIOR SETTLEMENT AGREEMENT, WASHINGTON V. KLEM, THE DOC AGREED TO PROVIDE PLAINTIFF WITH ALL RELIGIOUS LITERATURE NEEDED TO CONDUCT THE DAILY RITUALS OF PLAINTIFF RELIGIOUS BELIEFS SEE: 268; 323; 324; 330; 270-272; 258; 274

249. DEFENDANT DENIED PLAINTIFF RELIGIOUS PRACTICE & RLUIPA RIGHTS, STILL ONGOING TO DATE! SEE: 268

250. PLAINTIFF IS FOUNDER AND LEADER OF THE "CHILDREN OF THE SUN CHURCH", THEIR BELIEFS DICTATES A DAILY READING OF FOUR DIFFERENT SPIRITUALLY INSPIRED AFRO-KENTRIK BOOKS OR LITERATURE ON A DAILY BASIS. TO DATE! DEFENDANT CONTINUE TO DENY PLAINTIFF RELIGIOUS LITERATURE, AND OR DENIED PLAINTIFF RELIGIOUS BOOKS FROM 1/15/17-THROUGH FEBRUARY 10, 2020 WHICH PREVENTED PLAINTIFF FROM CONDUCTING DAILY RITUALS FOR APPROX 37 STRAIGHT MONTHS OR APPROX 1100 STRAIGHT DAYS.

251. DEFENDANT DENIED PLAINTIFF ACCESS TO RELIGIOUS BOOKS FOR 1100 STRAIGHT DAYS, AND CONTINUE DENY PLAINTIFF LOOSE LEAF PRINTED LITERATURE TO DATE! BASED ON NON PENALOGICAL REASONS, i.e. RACE, RETALIATION, RELIGIOUS BELIEFS, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES SEE: 268

252. DEFENDANT, P. MAUL, ON GOING TO DATE! CHAPLAIN SUPERVISOR, BASED ON NON PENALOGICAL REASONS, i.e. RACE, RETALIATION, RELIGIOUS BELIEFS, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES DENY PLAINTIFF RELIGIOUS LOOSE LEAF LITERATURE SEE: 268; 261; 262-264; 287-290

253. DEFENDANT, W. L. BOWERS, ABLANK UNIT MANAGER, CONTINUED UNTIL 12/10/19 BASED ON NON PENALOGICAL REASONS, i.e. RACE, RETALIATION, RELIGIOUS BELIEFS, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES SEE: 268; 105-113; 283; 380; 376

254. DEFENDANT, E. TICE, WARDEN CONTINUED UNTIL 2/10/20 DENIED PLAINTIFF RELIGIOUS BOOKS; AND ON GOING TO DATE! DENYING LOOSE LEAF RELIGIOUS LITERATURE (i.e. NEWSLETTERS, ESSAYS, COMMENTARY, PAMPHLET, FLYER, etc) BASED ON NON PENALOGICAL REASONS, i.e. RACE, RETALIATION, RELIGIOUS BELIEFS, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES SEE: 268; 118; 130; 390

255. DESPITE RLUIPA MANDATE TO ENFORCE THE LEAST RESTRICTIVE MEANS CONCERNING PROVIDING PLAINTIFF RELIGIOUS NEEDS, DEFENDANT REPEATEDLY DENIED PLAINTIFF ACCESS TO PLAINTIFF OWN RELIGIOUS LITERATURE; ALREADY APPROVED BY SRI-SOMMERSET. N.B. PLAINTIFF IS STILL BEING DENIED LOOSE LEAF LITERATURE, i.e. ESSAYS, NEWSLETTERS, COMMENTARY, PAMPHLET, FLYERS, etc., WHICH MAKES IT IMPOSSIBLE FOR PLAINTIFF TO PRACTICE PLAINTIFF RELIGIOUS BELIEFS.

256. PLAINTIFF RIGHT TO PRACTICE PLAINTIFF RELIGIOUS BELIEFS IS GUARANTEED BY 1st AMENDMENT

257. DEFENDANT OPENLY PROFESSING SILENTIA TIMES THAT PLAINTIFF HAVING SUED DEFENDANT PERSONALLY, AND SCI-GREENE AND SCI-SOMERSET FOR STAFF OR MEDICAL PROGRESS-  
TIONS, OR THEIR FAMILY MEMBER, AND GRIEVANCES FILED AGAINST DEFENDANT PERSONAL-  
LY, AND PLAINTIFF CONTINUOUS COMMUNICATION WITH AUTHORITIES IS WITH DEFENDANT  
CONTINUES TO DENY PLAINTIFF TO PRACTICE PLAINTIFF RELIGIOUS BELIEFS.

258. PLAINTIFF, THE FOUNDER-LEADER OF THE "CHILDREN OF THE SUN" CHURCH,  
WHO'S BELIEFS MANDATES THAT PLAINTIFF READ FROM FOUR DIFFERENT BOOKS PER DAY BY  
FOUR DIFFERENT AUTHORS THAN THOSE READ WITHIN THE PAST FOUR DAY CONCERNING  
SUBJECT DIFFERENT FROM THOSE READ ABOUT IN THE PAST FOUR DAYS, DEFENDANT, RAAB-  
VED-NE-KASTED ABOUT DEPRIVING PLAINTIFF ACCESS TO PLAINTIFF AFRIKANIK LITERA-  
TURE CAUSING IT TO BE IMPOSSIBLE TO PRACTICE THE "DAILY" RITUAL OF PLAINTIFF RELIGI-  
OUS BELIEFS SEE: 323, 326, 330, 270, 289

259. DEFENDANT DECLARED, "THERE'S NOTHING ABOUT AFRIKAN IS WORSHIP", "AFRIKAN HAS  
NO GOD", "CHILDREN OF THE SUN" WHO THE HELL ARE THEY", "THE CHILDREN OF THE SUN  
CHURCH" FOUNDER-ALL FOLLOWERS ARE UNDESERVING TO BE GRANTED ACCESS TO THEIR RE-  
LIGIOUS LITERATURE, "CHILDREN OF THE SUN CHURCH" IS NOT A RELIGION, WHILE PROVID-  
ING ACCESS TO RELIGIOUS LITERATURE TO ALL OTHER INMATES, ESPECIALLY WHITE INMATES/  
AND BLACK CHILDREN OF THE SUN CHURCH BELIEVERS, DEFENDANT TO DATE, CONTINUED  
DENY PLAINTIFF ACCESS TO LOSING LITERATURE RELIGIOUS LITERATURE BASED ON NON PENALOG-  
ICAL REASONS, i.e. RACE, RETALIATIONS, RELIGIOUS BELIEFS, PENALTY FOR COMMUNICATIONS  
WITH AUTHORITIES, WHILE PROVIDING OTHERS, ESPECIALLY FOR WHITES

260. ANGERED BY PLAINTIFF HAVING SUED THEM PERSONALLY, BEQUEST TO STAFF, AND GRIEVAN-  
CES, DEFENDANT DENIED PLAINTIFF POSSESSION OF HIS RELIGIOUS LITERATURE WHICH MA-  
DE IT IMPOSSIBLE FOR PLAINTIFF TO PRACTICE HIS RELIGIOUS BELIEFS : TO DATE! WHILE  
BIBY DEFENDANT <sup>IS</sup> NON COMPLIANCE TO BLWPA (AND FREEDOM OF RELIGION) MANDATE OF  
THE LEAST RESTRICTIVE MEANS SEE 288, 268

261. ON OR NEAR 8.2.17, DEFENDANT, P. MAUST, CHAPLAIN SUPERVISOR, ACCESS TO RELIGIOUS LITERA-  
TURE; DEFENDANT, MAUST DENIED PLAINTIFF RELIGIOUS LITERATURE NEEDED TO PRACT-  
ICE PLAINTIFF RELIGIOUS BELIEFS; SPOKE TO PLAINTIFF IN BURST OF CONTEMPT-AS IF  
HAVING WANTED PHYSICALLY STRIKE PLAINTIFF, USING LAXONS LADENED WITH RACIST  
OVERTONES CAUSING PLAINTIFF TO FEAR FOR HIS LIFE SEE: 252, 287-290, 390, 392, 396-398  
268, 262-264,

262. SAME EVENTS CONTINUING TO DATE! DEFENDANT, MAUST DENIAL OF PLAINTIFF RE-  
LIGIOUS LITERATURE FOR THIS PAST APPROX 2555 DAYS STRAIGHT, TO DATE! DEFENDANT,  
MAUST CONTINUOUSLY CAUSE PLAINTIFF THE INABILITY TO PRACTICE HIS "DAILY" RELIGIOUS  
BELIEFS, DEFENDANT, MAUST ACTION VIOLATED PLAINTIFF FREEDOM OF RELIGION, AND RUIN  
RIGHTS TO LEAST RESTRICTIVE MEANS BASED ON NON PENALOGICAL REASONS, ~~REASONS~~ PER  
42 USC 2000cc-5, 18 USC 1741<sup>247</sup>; 1ST AMENDMENT SEE: 30, 35, 41

263. SAME EVENTS DEFENDANT, MAUST NON COMPLIANCE TO BLWPA MANDATE OF LEAST RE-  
STRICTIVE MEANS, BASED ON NON PENALOGICAL REASONS, i.e. RACE, RELIGIOUS BELIEFS,  
RETALIATION, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES, DENIED PLAINTIFF  
2550 STRAIGHT DAYS, ON ~~DATE~~ TO DATE, OF "DAILY" RELIGIOUS PRACTICE. DEFEND-  
ANT: 3:19-cv-00196

ANT, MAUST ACTIONS CONSTITUTE RELIGIOUS PROPERTY VIOLATIONS PER 42 USC 2000-  
205; 18 USC 133347; 1ST AMENDMENT

264. SAME EVENT: KNOWN BY PLAINTIFF HAVING SUBMITTED REQUEST TO STAFF AND  
FILED GRIEVANCE AGAINST DEFENDANT, MAUST PERSONALLY, DEFENDANT, MAUST CON-  
TINUED TO DENY PLAINTIFF LITERATURE, WHICH MAKES IT IMPOSSIBLE FOR PLAINTIFF TO PRACT-  
ICE HIS RELIGIOUS BELIEFS TO DATE! WHEREBY DEFENDANT, MAUST IS NOW COMPLIANT TO  
RLUIPA MANDATE OF THE LEAST RESTRICTIVE MEANS, DEFENDANT, MAUST ACTIONS CONSTITUTE  
RELIGIOUS PROPERTY VIOLATIONS PER 42 USC 2000-205; 18 USC 133347; 1ST  
AMENDMENT SEE: 268

265. ON OR NEAR 12.3.08, WHILE HOUSED IN THE RHU OF SCI-HUNTINGDON, HAVING FOUR  
BOXES OF RELIGIOUS-ILLEGAL PROPERTY IN PLAINTIFF CELL, AND SEVEN BOXES OF RELIG-  
IOUS-ILLEGAL PROPERTY IN STORAGE IN SCI-HUNTINGDON RHU STORABLE ROOM, PLAINTIFF  
DUE TO ENTHUSED IN THE WASHINGTON V. KLEM SETTLEMENT AGREEMENT WHEREIN PLAINT-  
IFF AND BOC DRAFTED THESE WORDS INTO THE SETTLEMENT N.B. MR. WASHINGTON MAY RE-  
TAIN ONE FOOT LOCKER AND THREE OF HIS SEVEN ~~RECORD~~ RECORD CENTER BOXES IN HIS CELL  
WHILE HOUSED IN THE GENERAL POPULATION SEE: 268

266. SAME EVENT: TO ENSURE THAT PLAINTIFF WOULD HAVE NINE BOXES OF PROPE-  
RTY WHEN PLAINTIFF WAS RELEASED FROM THE RHU, TO CONSOLIDATE WHAT PLAINTIFF-ONE  
HAD ALREADY AGREED TO, I.E. MR. WASHINGTON WILL BE PERMITTED TO POSSESS THE NINE ~~RE~~  
STORAGE BOXES OR EQUIVALENT, IN LIGHT OF SCI-HUNTINGDON WANTING TO WITH-  
HOLD FIVE BOXES OF PLAINTIFF PROPERTY BECAUSE PLAINTIFF ALREADY HAS FOUR BOXES  
INSIDE OF PLAINTIFF CELL; LEAVING TWO IN THE PROPERTY ROOM SEE: 268

267. ALL OF THE DICTATES OF WASHINGTON V. KLEM, SETTLEMENT AGREEMENT, WAS FULL-  
Y ENFORCED BY STAFF, INCLUDING SCI-SOMERSET RHU STAFF FOR 99 STRAIGHT MON-  
THS AT THAT TIME; THEN, BASED ON NON PENALOGICAL INTEREST, I.E. RAPE, RELIGIOUS  
BELIEFS, RETALIATION, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES, PLAINT-  
IFF WOULD NOT SIGN OFF ON GRIEVANCE, DEFENDANT DISREGARDED-REINTERPRET  
ED THIS SETTLEMENT AGREEMENT FOR THE SAKE OF DENYING PLAINTIFF HIS RELIGIOUS  
ILLEGAL PROPERTY "ALREADY APPROVED" BY THE SOMERSET ADMINISTRATION,

268. N.B. ON OR NEAR 12.31.19, REVERSAL OF GRIEVANCE DECISION ON REMANDED  
INITIAL REVIEW RESPONSE ORN #817817, BY DEFENDANT, E. TICE, WARDEN, WH-  
ICH VERBAL THAT DEFENDANT INDEED IN NON COMPLIANCE TO COURT ORDER, WASH-  
INGTON V. KLEM, SETTLEMENT AGREEMENT, AND SCI-SOMERSET OWN APPROVAL  
RESULTED/IS TANTAMOUNT TO A DENIAL PLAINTIFF RELIGIOUS PRACTICE, AND  
RLUIPA RIGHTS WHICH CONSTITUTE A VIOLATION OF PLAINTIFF RIGHT TO  
FREEDOM OF RELIGION, GUARANTEED BY 1ST AMENDMENT, 42 USC  
2000-205; 18 USC 133347, ALSO NOT THE LEAST RESTRICTIVE MEANS.

269. DEFENDANT USED UNTIL 2.10.20; 1100 STRAIGHT DAYS CONCERNING RELIGIOUS BOOKS,  
AND CONTINUE TO DATE! MORE THAN 3,555 STRAIGHT DAYS DENY PLAINTIFF LARGE  
LEAF LITERATURE; BY DEFENDANT ENFORCEMENT OF THE MOST RESTRICTIVE MEANS;  
AND TO DENY PLAINTIFF RELIGIOUS PRACTICE BASED ON NON PENALOGICAL IN-  
AC: 3:19-cv-00196

TEREST, i.e. RACE, RELIGIOUS BELIEFS, RETALIATION, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES, CAUSING PLAINTIFF TO CONTINUOUSLY LOSE REWARDS IN THE AFTERNLIFE DUE TO INABILITY TO WORSHIP IN PRAYER; PRACTICE HIS RELIGIOUS BELIEFS. SEE: 323, 326; 330, 275, 274

370. WITHOUT THE RELIGIOUS LITERATURE PLAINTIFF CANNOT PRACTICE HIS RELIGIOUS BELIEFS, i.e., READING FROM FOUR DIFFERENT BOOKS BY FOUR DIFFERENT AUTHORS THAN PLAINTIFF READ WITHIN THE PAST FOUR DAYS CONCERNING SUBJECT MATTERS, EVENTS, KINGDOMS, EMPIRES, PERSONALITIES, etc. THAN THOSE READ ABOUT IN THE PAST FOUR DAYS PLAINTIFF NEEDS TO PRAY OVER THE RELIGIOUS LITERATURE BEFORE AND AFTER READING; AND WHEN ALLOWED PLAINTIFF SPINKLE THE RELIGIOUS LITERATURE WITH WATER THAT WAS EXPOSED TO THE RAYS OF THE RISING SUN; AND ALLOW, WHEN POSSIBLE, ALLOW THE RELIGIOUS LITERATURE TO BE USED IN THE RITUAL OR THE DAY TO SIT IN THE RAYS OF THE RISING SUN. SEE: 258; 260-264; 371, 272

371. PLAINTIFF RELIGIOUS LITERATURE-N-THE RITUAL ARISE-N-THE SAME

372. DEFENDANT DENIAL OF THE LEAST RESTRICTIVE MEANS IS A VIOLATION OF RLUIPA, 42 USC 2000cc, 1-5; 18 USC 1333; 24T; FIRST AMENDMENT, WHICH TO DATE! HAS CONTINUED TO PLACE A BURDEN ON PLAINTIFF RELIGIOUS BELIEFS; EVEN IF THE BURDEN RESULTS FROM A RULE OF GENERAL APPLICABILITY

373. 42 USC 2000cc-3; MANDATE THE ACT SHALL BE CONSTRAINED IN FAVOR OF A BROAD PROTECTION OF RELIGIOUS EXERCISE, TO THE MAXIMUM EXTENT PERMITTED BY THE TERMS OF THIS ACT AND CONSTITUTION

374. PLAINTIFF, FOUNDER AND LEADER OF THE CHILDREN OF THE SUN CHURCH, WHERE BOOKS ARE NEEDED TO FULFILL PLAINTIFF MISSIONARY WORK

375. DEFENDANT ACTIONS INFILDED IRREPARABLE HARM TO PLAINTIFF TO DATE! CONTINUES TO SUFFER ON GOING CONCERNING THE LOSS OF REWARDS IN THE AFTERNLIFE

376. DEFENDANT, SAME EVENT, SERIES OF EVENTS, CONCERNING THE SAME LAWS, RETALIATIONS AGAINST PLAINTIFF UNLAWFULLY, IN VIOLATIONS OF PLAINTIFF RIGHTS UNDER 1ST AMENDMENT, THE ALLEGED ACTS ARE ALLEGED TO HAVE CAUSED PLAINTIFF INJURY TO PLAINTIFF 1ST AMENDMENT AND RLUIPA RIGHTS

377. BY DEFENDANT WITNESSING-N-BEING ADULTLY AWARE OF THIS MISCONDUCT OF OTHER DEFENDANT, AND ENCOURAGED THE CONTINUATION OF THAT MISCONDUCT DEFENDANT IS ALSO VIOLATING PLAINTIFF RIGHTS UNDER 1ST AMENDMENT, THE ALLEGED ACTS ARE ALLEGED TO HAVE CAUSED PLAINTIFF INJURY TO PLAINTIFF FREE-SPEECH-N-RLUIPA GUARANTEED BY 42 USC 2000cc, 1-5; 18 USC 1333; 24T; 1ST AMENDMENT

378. DEFENDANT, H. SROKA, GRIEVANCE COORDINATOR, REGULARLY-N-CONSISTENTLY REFUSED TO RESPOND TO PLAINTIFF TIMELY SUBMITTED GRIEVANCES THAT REQUESTED RELIEF DEMONSTRATE DAMAGES-N-REQUISTED STAFF; HINDERED, STYMIED, PREVENTED-N-OBSTACLED PLAINTIFF THE DUE PROCESS OF EXERCISING HIS RIGHTS TO SEEK REDRESS FROM DEFENDANT THROUGH USE OF THE INMATE GRIEVANCE SYSTEM, DOCUMENT 834 POLICY DEFENDANT, SROKA ACTIONS UNLAWFULLY IN VIOLATION OF PLAINTIFF FIRST AMENDMENT RIGHT OF FREE SPEECH, THESE ILLEGAL ACTIONS CAUSED PLAINTIFF INJURY TO PLAINTIFF FREE SPEECH RIGHTS GUARANTEED BY THE 1ST AMENDMENT; AND CONSTITUTE RETALIATION

279. ON OR NEAR 10/19, 15, 2, 10/16, 8, 12, 16, DURING CONFIDENTIAL INTERVIEWS DEFENDANT, H. SROKA, DECLARED WHEN PLAINTIFF REQUESTED WHY DEFENDANT SROKA WAS NOT RESPONDING TO HIS MANY TIMELY SUBMITTED GRIEVANCES, DEFENDANT, SROKA SPOKE AS IF SEEING PLAINTIFF "ABSOLUTELY NO FAULTS OR SHORTCOMINGS WERE DISCOVERED IN ANY OF PLAINTIFF'S ORIGINAL GRIEVANCES PLAINTIFF FILED; OTHERWISE SHE WOULD HAVE RESPONDED BACK TO EVERY ONE OF THEM" PLAINTIFF ASKED WHY DIDN'T SHE RESPOND TO ANY OF THE MANY GRIEVANCES WHILE PLAINTIFF REQUESTED MONETARY RELIEF, DEFENDANT, SROKA DECLARED THERE WAS NO NEED FOR PLAINTIFF TO MAKE SUCH A REQUEST, "BY PLAINTIFF DOING SO ONLY CREATES ANIMOSITY BETWEEN STAFF AND INMATES" AND "IN THE FUTURE SHE WOULD NOT RESPOND TO EVERY GRIEVANCE REQUESTING MONETARY RELIEF" NONE OF PLAINTIFF REQUEST TO HER CONCERNING HER NOT RESPONDING TO PLAINTIFF GRIEVANCES, DEFENDANT, SROKA ACTIONS CONSTITUTE FREE SPEECH VIOLATIONS GUARANTEED BY THE 1ST AMENDMENT

280. ON OR NEAR 11.7.18, 12.19, 18, 7.19, 19, CONFIDENTIAL INTERVIEWS, DEFENDANT, E. TICE, WARDEN, WHEN PLAINTIFF MADE HIM AWARE THAT PLAINTIFF WAS BEING DENIED THE LEAST RESTRICTIVE MEANS, DEFENDANT, TICE OPENLY PROFESSED WASHINGTON V. KLEM, SETTLEMENT ONLY SAYS THAT ON PAPER, JUDGE RUNS HIS COURT, BUT DEFENDANT, TICE RUNS THIS PRISON, BECAUSE NO JUDGE CAN EVER GIVE A BLACK MAN RIGHTS A WHITE MAN WILL RESPECT, AND HE WAS NOT ABOUT TO COMPLY TO WASHINGTON V. KLEM SETTLEMENT, WHICH MARGATES THE ENFORCEMENT OF THE LEAST RESTRICTIVE MEANS. SEE 268

281. SAME EVENTS: DEFENDANT, TICE, WARDEN, DECLARED HE WAS AWARE OF THE DUTIES OF WASHINGTON V. KLEM, SETTLEMENT, PP. 5, 7-8, WHICH PROVIDES PLAINTIFF IS ALLOWED EXCESS PERSONAL PROPERTY, ACCORDING TO DEFENDANT, TICE, HE WAS PENALIZING PLAINTIFF FOR ALWAYS FILING GRIEVANCES, BEING DISRESPECTFUL IN REFUSING TO SIGN ONE A GRIEVANCE, PLAINTIFF RELIGIOUS BELIEFS, RACE, AND ENDING COMMUNICATIONS WITH AUTHORITIES, I.E. BASED ON NON PENALOGICAL INTEREST. DEFENDANT, TICE ACTIONS CONSTITUTE FREE SPEECH - N - RLUIPA VIOLATIONS GUARANTEED BY 1ST AMENDMENT, 42 USC 2000cc, 1-5, 18 USC 1333, 247 SEE: 268

282. ON OR NEAR 1.9, 18 ON GOING UNTIL 12.10.19, APPROX. 200 STRAIGHT DAYS, DEFENDANT, W.L. BOWERS, UNIT MANAGER OF A BLOCK DENIAL OF THE LEAST RESTRICTIVE MEANS HAS MADE PLAINTIFF DAILY PRACTICE OF PLAINTIFF RELIGIOUS BELIEFS IMPOSSIBLE. PLAINTIFF RELIGIOUS AND RELATIVES LITERATURE ARE ONE AND THE SAME, THEREFORE, DEFENDANT, BOWERS DENIED PLAINTIFF POSSESSION OF HIS RELIGIOUS LITERATURE, DEFENDANT, BOWERS ALSO DENIED PLAINTIFF THE "DAILY" PRACTICE OF HIS RELIGIOUS BELIEFS. SEE 268

283. SAME EVENT: DEFENDANT, BOWERS, DENIAL OF THE LEAST RESTRICTIVE MEANS DID NOT MERELY DENY PLAINTIFF ONE OR TWO DAYS OF PLAINTIFF RELIGIOUS PRACTICE OF HIS RELIGIOUS BELIEFS, DEFENDANT, BOWERS DENIED PLAINTIFF 200 STRAIGHT DAYS OF WORSHIP - N - PRACTICE OF HIS RELIGIOUS BELIEFS. THIS COULD HAVE EASILY BEEN AVOIDED WITH COMPLIANCE OF THE "LEAST RESTRICTIVE MEANS", PER RLUIPA, ACCORDING TO DEFENDANT, BOWERS, DENIAL OF RELIGIOUS LITERATURE WAS DUE TO PLAINTIFF FILING GRIEVANCES AGAINST DEFENDANT, BOWERS, I.E., NON PENALOGICAL INTEREST. DEFENDANT, BOWERS ACTIONS CONSTITUTE FREE SPEECH - N - RLUIPA RIGHTS VIOLATIONS GUARANTEED

EBD BY 42 USC 2000cc, 1-5; 18 USC 13 ? 247; 1st AMENDMENT

284. ON OR NEAR 4.8.17, FAILURE TO ACT, DEFENDANT, R. SNYDER, CAPTAIN OF SECURITY - ABORDED AND ROBBED TWO WHITE INMATES TO SUCCESSFULLY STEAL-N-TRADE PLAINTIFF RELIGIOUS BOOKS FOR DRUGS. PLAINTIFF REPEATEDLY MADE DEFENDANT, SNYDER AND ARB SEVERAL TIMES VIA CONFIDENTIAL INTERVIEWS-N-REQUEST TO STAFF DEFENDANT, SNYDER FOR SEVERAL WEEKS, RESPONDED, "SIRZ, THE WHITE MAN STOLE YOUR RELIGIOUS BOOKS," "BLACKS ALWAYS CLAIM WHITES ROBBED THEM"

285. SAME EVENT, DEFENDANT, SNYDER, HAVING BEEN MADE AWARE SEVERAL TIMES ONCE DEFENDANT SNYDER NOT ACTING FOR 30-DAYS OR MORE ALLOWED THE TWO ALL-BROWN INMATES, ALREADY IDENTIFIED, WHO HAD ALREADY ADMITTED THEY STOLE PLAINTIFF BOOKS, TO HIDE PLAINTIFF BOOKS WITH THEIR FRIENDS, THEN EXCHANGE THE BOOKS FOR DRUGS.

286. SAME EVENT: DEFENDANT, SNYDER RESPONDED IMMEDIATE TO PROVIDE SAFETY-N-PROTECTION TO OTHER INMATES, ESPECIALLY WHITE INMATES, BASED ON NON-PENAL POLITICAL INTEREST, I.E. RACE, RELIGIOUS BELIEF, RETALIATION, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES, NOT SIGNING OFF ON GRIEVANCE # 659236. THE LOSS OF RELIGIOUS BOOKS PLACED A BURDEN ON PLAINTIFF RELIGIOUS PRACTICE OF HIS RELIGIOUS BELIEFS. DEFENDANT, SNYDER ACTION-N-NON ACTION CONSTITUTE FREE SPEECH, RUINA, AND UNUSUAL PUNISHMENT VIOLATIONS, ALSO EQUAL PROTECTION VIOLATIONS GUARANTEED BY 42 USC 2000cc, 1-5; 18 USC 13 ? 247; 1st, 8th, AND 14th AMENDMENTS

287. ON OR NEAR 8.5.17 - STILL ONGOING TO DATE! RELIGIOUS LITERATURE, DEFENDANT, P. MAUST, CHAPLAIN SUPERVISOR PROVIDED ALL OTHER INMATES, ESPECIALLY WHITE INMATES, AND/OR NON CHILDREN OF THE "SUN" CHURCH BELIEVERS, WITH PUBLICATIONS "FREE OF CHARGE" IRRESPECTIVE OF THE AMOUNT OF RELIGIOUS LITERATURE CONCERNING THEIR RELIGIOUS BELIEFS, IRRESPECTIVE AVAILABILITY IN THE MAIN LIBRARY, BASED ON NON-PENAL POLITICAL INTEREST. DEFENDANT, MAUST DENIED PLAINTIFF REQUEST FOR RELIGIOUS LITERATURE READILY AVAILABLE, CONCERNING PLAINTIFF RELIGIOUS BELIEFS, I.E. PERTAINING TO AFRICAN PEOPLE-N-APRIKA

288. SAME EVENTS: DEFENDANT, P. MAUST, DENIED PLAINTIFF, A INMATE INMATE FOR THE 54 MONTHS IN SAN-SOMERSSET, RELIGIOUS LITERATURE NOT IN MAIN LIBRARY, CONTINUING TO DATE! ACCORDING TO DEFENDANT, P. MAUST, BECAUSE THE RELIGIOUS LITERATURE PLAINTIFF REQUESTED CONCERNED HISTORICAL FACTS ABOUT AFRICA-N-APRIKAN PEOPLE, IT IS NOT RELIGIOUS LITERATURE, THEREFORE, DEFENDANT, MAUST DECLINED HE ISN'T HAVE TO PROVIDE PLAINTIFF WITH SUCH LITERATURE.

289. SAME EVENT: CONTINUING TO DATE! DEFENDANT, MAUST DENIED PLAINTIFF RELIGIOUS LITERATURE FOR 1,000 STRAIGHT DAYS TO DATE! WHICH DEFENDANT, MAUST HAS READILY AVAILABLE ACCESS TO AN INEXHAUSTIBLE SUPPLY OF RELIGIOUS LITERATURE, DEFENDANT, MAUST DID NOT USE THE LEAST RESTRAINED MEANS. DEFENDANT, MAUST DENIAL OF RELIGIOUS LITERATURE PLACED A BURDEN ON THE "DAILY" PRACTICE OF PLAINTIFF RELIGIOUS BELIEFS. DEFENDANT, MAUST ACTIONS CONSTITUTE FREE SPEECH, RUINA, AND EQUAL PROTECTION VIOLATIONS OF PLAINTIFF RIGHTS GUARANTEED BY 42 USC 2000cc, 1-5; 18 USC 13 ? 247; 1st, 8th, AND 14th AMENDMENTS

290. SAME EVENT: ON 2019 TO DATE! DEFENDANT, MAUST DECLARED, IF PLAINTIFF HAD

- NOT SUED ALL SCI-SOMERSET STAFF, ALSO SUED DEFENDANT, MAUST, REFUSED TO SIGN OF AN ORN #654336; AND CONTINUOUSLY COMMUNICATED WITH AUTHORITIES, DEFENDANT, MAUST WOULD PROVIDE PLAINTIFF WITH RELIGIOUS LITERATURE UPON REQUEST. DEFENDANT, MAUST ACTIONS CONSTITUTE FREE SPEECH-N-RELIGION VIOLATIONS PER 42 USC 1985; 18 USC 1362; 1ST AMENDMENT SEE: 266; 252; 261-264; 277; 287-289; 390; 392; 396-398

291. DEFENDANT, K. DELISMA, MEDICAL DIRECTOR, SICK CALL; RATIONALE FOR HIS DISLIBERATE INDIFFERENCE TO PLAINTIFF'S CHRONIC ALIMENTS, WAS THE PENALTY FOR PLAINTIFF HAVING FILED GRIEVANCE AGAINST DEFENDANT, DELISMA; HAVING SUED DEFENDANT, DELISMA AND SCI-SOMERSET MEDICAL STAFF UNDER DEFENDANT, DELISMA SUPERVISION, AND COMMUNICATIONS WITH AUTHORITIES, DEFENDANT, DELISMA ACTIONS CONSTITUTE FREE SPEECH, CONSPIRACY, RETALIATION VIOLATIONS PER 1ST AMENDMENT

, DEFENDANT, K. DELISMA'S OCCURRED ON OR NEAR 11.27.18; 12.13.18; 2.8.19; 4.18.19; 5.30.19; 6.12.19; 8.1.19; 9.5.19; 10.2.19; 11.1.19; 1.28.18; 2.3.30; 2.17.20; 3.16.20; 5.4.20; PER 42 SEE: 122; 249; 163; 164; 21; 26; 35; 40-60; 62; 64; 27; 40; 52; 56; 57; 59; 62

292. DEFENDANT, J. BIRKE, SICK CALL, MEDICAL DIRECTOR PROPOSED PENALTIES PLAINTIFF FOR HAVING SUED MEMBERS OF SCI-SOMERSET MEDICAL STAFF UNDER HIS SUPERVISION, FILING GRIEVANCES, CONTINUOUS COMMUNICATIONS WITH AUTHORITIES, DEFENDANT, BIRKE ACTION CONSTITUTES CONSPIRACY, RETALIATION-N-FREE SPEECH VIOLATIONS PER 42 USC 1985; 1ST AMENDMENT SEE: 369; 380-383; 389; 391; 395; 406; 407; 409; 422; 423; 27; 40; 52; 56; 57; 59; 62; 91; 20; 35; 40-60; 62; 64; 293. ACCORDING TO DEFENDANT, E. KAUFERMAN, PAC, SICK CALL; PUNISHING PLAINTIFF FOR FILING GRIEVANCES AGAINST DEFENDANT, KAUFERMAN, AND SUED HIM, AND COMMUNICATIONS, WITH AUTHORITIES, DEFENDANT, KAUFERMAN ACTIONS RETALIATION, CONSPIRACY-N-FREE SPEECH CONSTITUTE VIOLATION GUARANTEED BY 1ST AMENDMENT; 42 USC 1985 SEE 310; 380-383; 393; 406; 427; 422; 423; 124

294. DEFENDANT, A. IRWIN, OPTOMETRIST, EXAM; RETALIATION-N-CONSPIRACY ACCORDING TO DEFENDANT, IRWIN, HIS DENIAL OF CARE WAS MADE TO PLAINTIFF HAVING FILED GRIEVANCES-N-LAW SUITS AGAINST DEFENDANT, IRWIN, AND SCI-SOMERSET MEDICAL STAFF, CONTINUOUS COMMUNICATIONS WITH AUTHORITIES, DEFENDANT, IRWIN ACTIONS CONSTITUTE CONSPIRACY-N-RETALIATION VIOLATION OF PLAINTIFF FREE SPEECH PER 1ST AMENDMENT, 42 USC 1985 SEE: 68; 72; 144; 391-393; 395; 380-383; 393; 395; 406; 407; 422; 423; 311; 41; 26; 27; 35; 40-60; 62; 64;

295. DEFENDANT, R. PLAYSO, PAC, SICK CALL; ALLEGED CONSPIRACY-N-RETALIATION TO PENALIZE PLAINTIFF FOR SUING DEFENDANT, PLAYSO; FILING GRIEVANCES-N-SUITS AGAINST DEFENDANT, PLAYSO AND SCI-SOMERSET MEDICAL STAFF, CONTINUOUS COMMUNICATIONS WITH AUTHORITIES, DEFENDANT, PLAYSO ACTIONS VIOLATED PLAINTIFF FREE SPEECH RIGHT, PER 1ST AMENDMENT; 42 USC 1985 SEE: 131; 134; 135; 321; 380-383; 393; 395; 406; 407; 422; 423; 27; 40; 52; 62; 64

296. DEFENDANT, L. DONNELLY, PAC, SICK CALL; ALLEGED CONSPIRACY-N-RETALIATION AS PENALTY TO PLAINTIFF FOR FILING GRIEVANCES; HAVING SUED DEFENDANT, DONNELLY AND SCI-SOMERSET MEDICAL STAFF, CONTINUOUS COMMUNICATIONS WITH AUTHORITIES, DEFENDANT, DONNELLY ACTIONS CONSTITUTE FREE SPEECH VIOLATIONS PER 1ST AMENDMENT, 42 USC 1985 SEE: 114; 116; 313; 21; 26; 35; 40-62; 64

297. DEFENDANT, J. FETTERMAN, PAC, SICK CALL, CONSPIRACY-N-RETALIATION, TO PENALTY: 3:19-cv-00196